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*Counsel for Defendants The Chubb Corporation,  
Federal Insurance Company, Executive Risk  
Indemnity Inc., and Vigilant Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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IN RE: INSURANCE BROKERAGE  
ANTITRUST LITIGATION  
  
APPLIES TO ALL COMMERCIAL  
INSURANCE BROKERAGE ACTIONS

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:  
: MDL No. 1663  
:  
: Civil No. 04-5184 (GEB)  
:  
: Hon. Garrett E. Brown, Jr.  
:

**NOTICE OF MOTION TO SEAL PURSUANT TO D.N.J. Civ. R. 5.3**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on such time and date as to be determined by the Court, the undersigned counsel for defendants The Chubb Corporation, Federal Insurance Company, Executive Risk Indemnity Inc., and Vigilant Insurance Company (collectively, the “Chubb Defendants”) shall move before the Honorable Patty Shwartz, United States Magistrate Judge, for entry of an Order sealing ¶ 438 of the Plaintiffs’ Second Consolidated Amended Commercial Class Action Complaint pursuant to D.N.J. Civ. R. 5.3;

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the Chubb Defendants shall rely on the letter brief and declaration submitted herewith; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order has been submitted herewith pursuant to the Rules of this Court.

Dated: June 6, 2007

Respectfully submitted,

HOGAN & HARTSON LLP  
Attorneys for the Chubb Defendants

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**UNITED STATES DISTRICT COURT  
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MDL No. 1663  
  
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**[PROPOSED] ORDER GRANTING  
THE CHUBB DEFENDANTS' MOTION TO SEAL**

THIS MATTER having come before the Court upon the motion of defendants The Chubb Corporation, Federal Insurance Company, Executive Risk Indemnity Inc., and Vigilant Insurance Company (collectively, the "Chubb Defendants"), by their counsel, to seal ¶ 438 of the Plaintiffs' Second Consolidated Amended Commercial Class Action Complaint; and the Court having considered the Chubb Defendants' letter brief and declaration in support of sealing; and for good cause being shown;

IT IS on this \_\_\_\_ day of \_\_\_\_\_, 2007, ORDERED that the Chubb Defendants' motion to seal is hereby GRANTED.

IT IS FURTHER ORDERED that ¶ 438 of the Plaintiffs' Second Consolidated Amended Commercial Class Action Complaint shall remain under seal.

Dated: \_\_\_\_\_

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Hon. Patty Shwartz  
United States Magistrate Judge